

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OSURE BROWN, on his own behalf and
on behalf of other similarly situated
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00669-RSL

STIPULATION AND ORDER
REGARDING STAY OF
DISCOVERY

STIPULATION

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Osure Brown (“Plaintiff”) and Defendants Transworld Systems Inc. (“TSI”), Patenaude & Felix, APC (“P&F”), U.S. Bank National Association (“U.S. Bank”), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), hereby stipulate and agree to stay discovery, including responses to outstanding Requests for Production and Notices of Deposition, until 30 days after the Court rules on the defendants’ pending

STIPULATION AND ORDER REGARDING STAY
OF DISCOVERY (No. 2:20-cv-00669-RSL) –1

151033028.1

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 Motions to Dismiss filed on August 6, 2020 and noted for hearing on October 16, 2020¹. The
2 parties have further agreed that if the Court denies any defendant's motion to dismiss in whole or
3 in part and taking into account the Court's ruling:

4 1. Any remaining parties agree to jointly or separately meet and confer within 10
5 days of the Court's ruling to determine available dates and confer concerning any objections or
6 other issues related to the Notices of Deposition served on or before January 12, 2021; and

7 2. Without waiving any objections to specific Requests for Production and any
8 subsequent meet and confer, defendants agree to make good faith efforts to produce responses
9 and document production within 30 days of the Court's ruling on Requests for Production served
10 on or before January 12, 2021.

11 The parties have entered into this stipulation and agreement to mutually cooperate in the
12 management of this action. Nothing in this agreement concerning discovery waives any
13 objections that the Parties may have to such discovery or any party's ability to make rolling
14 document productions.

15
16
17
18
19
20
21
22
23
24
25
26

¹ See Dkt. Nos. 62, 65, 68, 69, 71 and 77.

1 DATED: January 19, 2021.

2 HENRY & DEGRAAFF, P.S.

3 By: /s/ Christina L. Henry
4 Christina L. Henry, WSBA No. 31273
5 787 Maynard Ave S
6 Seattle, WA 98104
7 Telephone: 206.330.0595
8 Facsimile: 206.400.7609
9 chenry@HDM-legal.com

10 *Counsel for Plaintiff*

11 BORISON FIRM, LLC

12 By: /s/ Scott Borison
13 Scott Borison, *Pro Hac Vice*
14 1900 S. Norfolk St., Suite 350
15 San Mateo, CA 94403
16 scott@borisonfirm.com

17 *Counsel for Plaintiff*

18 CORR CRONIN LLP

19 By: /s/ Emily J. Harris
20 Emily J. Harris, WSBA No. 35763
21 Benjamin C. Byers, WSBA No. 52299
22 1001 Fourth Avenue, Suite 3900
23 Seattle, WA 98154
24 eharris@corrchronin.com
25 bbyers@corrchronin.com

26 *Attorneys for Transworld Systems Inc.*

CONSUMER LAW CENTER, LLC

By: /s/ Phillip Robinson
Phillip Robinson, *Pro Hac Vice*
8737 Colesville Road, Suite 308
Silver Spring, MD 20910
phillip@marylandconsumer.com

Counsel for Plaintiff

SESSIONS, FISHMAN, NATHAN & ISRAEL

By: /s/ Bryan C. Shartle, Esq.
Bryan C. Shartle, *Pro Hac Vice*
Justin Homes, *Pro Hac Vice*
Bradley St. Angelo, *Pro Hac Vice*
3850 North Causeway Boulevard, Suite 200
Metairie, LA 70002
bshartle@sessions.legal
jhomes@sessions.legal
bstangelo@sessions.legal

Attorneys for Transworld Systems Inc.

JONES DAY

By: Albert J. Rota
Albert J. Rota, *Pro Hac Vice*
2727 North Harwood St.
Dallas, TX 75201
ajrota@jonesday.com

Attorneys for U.S. Bank National Association

PERKINS COIE LLP

LEE SMART, P.S., INC.

By: /s/ Kristine E. Kruger
By: /s/ Thomas N. Abbott
Kristine E. Kruger #44612
Thomas N. Abbott #53024
1201 Third Avenue, Suite 4900
Seattle, WA 98101
Telephone: 206.359.8000
Facsimile: 206.359.9000
KKruger@perkinscoie.com
TAbbott@perkinscoie.com

By: /s/ Marc Rosenberg
Marc Rosenberg, WSBA No. 31034
1800 One Convention Place
701 Pike St.
Seattle, WA 98101
Mr@leesmart.com

Attorneys for Patenaude & Felix, APC

*Attorneys for Defendants U.S. Bank National
Association, National Collegiate Student Loan
Trust 2004-1, National Collegiate Student
Loan Trust 2004-2, National Collegiate
Student Loan Trust 2005-1, National
Collegiate Student Loan Trust 2005-2,
National Collegiate Student Loan Trust 2005-
3, National Collegiate Student Loan Trust
2006-1, National Collegiate Student Loan
Trust 2006-2, National Collegiate Student
Loan Trust 2007-1, National Collegiate
Student Loan Trust 2007-2*

ORDER

IT IS SO ORDERED.

Discovery in this matter is stayed, including responses to outstanding Requests for Production and Notices of Deposition, until 30 days after the Court rules on the defendants' pending motions to dismiss. If the Court denies any of defendant's motion to dismiss in whole or in part and taking into account the Court's ruling:

1. The parties shall jointly or separately meet and confer within 10 days of the Court's ruling to determine available dates and confer concerning any objections or other issues related to the Notices of Deposition served on or before January 12, 2021; and

2. Without waiving any objections to specific Requests for Production and any subsequent meet and confer, defendants shall make good faith efforts to produce responses and document production within 30 days of the Court's ruling on Requests for Production served on or before January 12, 2021.

DATED this 25th day of January, 2021.



Honorable Robert S. Lasnik